

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE AMBAC FINANCIAL GROUP,  
INC. SECURITIES LITIGATION

Civil Action No. 08-00411-NRB  
ECF Case

**LEAD PLAINTIFFS' NOTICE OF ENTRY INTO SETTLEMENT AGREEMENTS**

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

Steven B. Singer  
Kurt Hunciker  
Niki L. Mendoza  
Lauren A. McMillen  
1285 Avenue of the Americas  
New York, New York 10019  
Tel: (212) 554-1400  
Fax: (212) 554-1444

**KAPLAN FOX & KILSHEIMER LLP**

Frederic S. Fox  
Donald Hall  
Hae Sung Nam  
850 Third Avenue, 14th Floor  
New York, NY 10022  
Telephone: (212) 687-1980  
Facsimile: (212 ) 687-7714

*Attorneys for Lead Plaintiffs and Co-Lead Counsel for the Class*

Lead Plaintiffs respectfully submit this Notice to inform the Court that they have entered into the following settlement agreements in the above-encaptioned putative class action: (1) Stipulation of Settlement with Ambac and the Individual Defendants; and (ii) Stipulation of Settlement with the Underwriter Defendants. Copies of the Stipulations of Settlement are attached hereto as Exhibits 1 and 2.

Dated: May 6, 2011

Respectfully submitted,

**KAPLAN FOX & KILSHEIMER LLP**

/s/ Donald Hall

Frederic S. Fox

Donald Hall

Hae Sung Nam

850 Third Avenue, 14th Floor

New York, New York 10022

Telephone: (212) 687-1980

Facsimile: (212 ) 687-7714

**BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP**

/s/ Steven B. Singer

Steven B. Singer

Kurt Hunciker

Niki L. Mendoza

Lauren A. McMillen

1285 Avenue of the Americas, 38th Floor

New York, New York 10019

Telephone: (212) 554-1400

Facsimile: (212) 554-1444

*Attorneys for the Lead Plaintiffs and Co-Lead Counsel for the Class*